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Attorneys for Defendant  
PANASONIC CORPORATION OF NORTH AMERICA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

NATHAN MUCHNICK, INC., on behalf of itself  
and all others similarly situated,

Plaintiff,

v.

CHUNGHWA PICTURE TUBES, LTD.;  
TATUNG COMPANY OF AMERICA, INC.;

Case No. CV 07 5981-SC

**STIPULATION RE EXTENSION OF  
TIME FOR DEFENDANT TO  
ANSWER, MOVE, OR OTHERWISE  
RESPOND TO PLAINTIFF'S  
COMPLAINT**

1 LG ELECTRONICS INC; LG PHILIPS  
2 DISPLAY USA, INC.; MATSUSHITA  
3 ELECTRIC INDUSTRIAL CO., LTD.;  
4 PANASONIC CORPORATION OF NORTH  
5 AMERICA; KONINKLIJKE PHILIPS  
6 ELECTRONICS N.V.; PHILIPS ELECTRONICS  
7 NORTH AMERICA CORPORATION;  
8 SAMSUNG ELECTRONICS CO., LTD.;  
9 SAMSUNG ELECTRONICS AMERICA, INC.;  
10 SAMSUNG SDI CO., LTD. f/k/a SAMSUNG  
11 DISPLAY DEVICE CO.; TOSHIBA  
12 CORPORATION TOSHIBA AMERICA  
ELECTRONICS COMPONENTS INC.;  
TOSHIBA AMERICA INFORMATION  
SYSTEMS INC.;  
MT PICTURE DISPLAY COMPANY;  
MT PICTURE DISPLAY CORPORATION OF  
AMERICA (New York); MT PICTURE  
DISPLAY CORPORATION OF AMERICA  
(Ohio); and LP DISPLAYS,

13 Defendants.

14 WHEREAS Plaintiff Nathan Muchnick, Inc. ("Plaintiff") filed a complaint in the  
15 above-captioned case on or about November 27, 2007;

16 WHEREAS Plaintiff alleges antitrust violations by manufacturers, distributors,  
17 and sellers of Cathode-Ray Tubes and products containing Cathode-Ray Tubes (collectively,  
18 "CRT products");

19 WHEREAS six complaints have been filed to date in federal district courts  
20 throughout the United States by plaintiffs purporting to bring class actions on behalf of direct and  
21 indirect purchasers alleging antitrust violations by manufacturers, distributors, and sellers of CRT  
22 products (collectively, "the CRT Cases");

23 WHEREAS, a motion is pending before the Judicial Panel on Multidistrict  
24 Litigation to transfer the CRT cases to this jurisdiction for coordinated and consolidated pretrial  
25 proceedings pursuant to 28 U.S.C. § 1407. A response to the motion has been filed, and the  
26 parties anticipate that additional responses will be filed by plaintiffs and various defendants;

1 WHEREAS Plaintiff anticipates the possibility of Consolidated Amended  
2 Complaints in the CRT Cases;

3 WHEREAS Plaintiff and Defendant Panasonic Corporation of North America  
4 (“PNA”) have agreed that an orderly schedule for any response to the pleadings in the CRT Cases  
5 would be more efficient for the parties and for the Court;

6  
7 WHEREAS Plaintiff agrees that the deadline for PNA to answer, move, or  
8 otherwise respond to the Complaint shall be extended until the earliest of the following dates: (1)  
9 forty-five days after the filing of a Consolidated Amended Complaint in the CRT Cases; or (2)  
10 forty-five days after Plaintiff provides written notice to PNA that Plaintiff does not intend to file a  
11 Consolidated Amended Complaint, provided however, that in the event that PNA should agree to  
12 an earlier response date in any CRT case, PNA will respond to the Complaint in the above-  
13 captioned action on that earlier date;

14  
15 WHEREAS Plaintiff further agrees that this extension is available, without further  
16 stipulation with counsel for Plaintiff, to all named defendants who notify Plaintiff in writing of  
17 their intention to join this Stipulation;

18 WHEREAS this Stipulation does not constitute a waiver by PNA of any defense,  
19 including but not limited to the defenses of lack of personal jurisdiction, subject matter  
20 jurisdiction, improper venue, sufficiency of process or service of process;

21  
22 WHEREAS, with respect to any named defendant joining the stipulation, this  
23 Stipulation does not constitute a waiver of any defense, including but not limited to the defenses  
24 of lack of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process  
25 or service of process.

26 PURSUANT TO LOCAL RULE 6-1(a), PLAINTIFF AND DEFENDANT PNA,  
27 BY AND THROUGH THEIR RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE  
28

1 AS FOLLOWS:

2 1. The deadline for PNA to answer, move, or otherwise respond to the  
3 Complaint shall be extended until the earliest of the following dates: (1) forty-five days after the  
4 filing of a Consolidated Amended Complaint in the CRT Cases; or (2) forty-five days after  
5 Plaintiff provides written notice to PNA that Plaintiff does not intend to file a Consolidated  
6 Amended Complaint, provided however, that in the event that PNA should agree to an earlier  
7 response date in any CRT case, PNA will respond to the Complaint in the above-captioned action  
8 on that earlier date.  
9

10 2. This extension is available, without further stipulation with counsel for  
11 Plaintiff, to all named defendants who notify Plaintiff in writing of their intention to join this  
12 Stipulation;  
13

14 3. This Stipulation does not constitute a waiver by PNA, or any other named  
15 defendant joining the Stipulation of any defense, including but not limited to the defenses of lack  
16 of personal jurisdiction, subject matter jurisdiction, improper venue, sufficiency of process or  
17 service of process.  
18

19 By his signature below, counsel for Panasonic Corporation attests under penalty of  
20 perjury that counsel for Nathan Muchnick, Inc. concurs in the filing of this Stipulation.

21 **IT IS SO STIPULATED.**

22 DATED: December 10, 2007

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